October 29, 2020

The Honorable Chair and Members
of the Hawai‘i Public Utilities Commission
Kekuanao‘a Building, First Floor
465 South King Street
Honolulu, Hawai‘i 96813

Dear Commissioners:

Subject: Docket No. 2018-0088
Instituting a Proceeding to Investigate Performance-Based Regulation
Transferring EoT Innovative Pilot Framework Into Docket No. 2018-0088

Pursuant to Commission Order No. 37373 ("Order 37373"), the Hawaiian Electric Companies[1] ("Companies") herein file the Electrification of Transporation Innovative Pilot Framework ("Framework") in Docket No. 2018-0088.

The Companies filed the Framework in Dkt. No. 2018-0135, pursuant to the Commision's June 19, 2020 correspondence in that prceeding. Subsequently, the Commission issued Order No. 37373, on October 16, 2020, transferring the Framework into Dkt. No. 2018-0088 and directing the Companies to file the Framework in that proceeding.

Very truly yours,

/s/ Dean K. Matsuura

Dean K. Matsuura
Director, Regulatory Rate Proceedings

Enclosure

[1] Hawaiian Electric Company, Inc., Maui Electric Company, Limited, and Hawai‘i Electric Light Company, Inc. are collectively referred to as the "Hawaiian Electric Companies."

August 31, 2020

The Honorable Chair and Members of the
Hawai'i Public Utilities Commission
465 South King Street, First Floor
Kekuanaoa Building
Honolulu, Hawai'i 96813

Dear Commissioners:

Subject: Docket No. 2018-0135 – Hawaiian Electric Companies
Electrification of Transportation ("EoT") Strategic Roadmap
EoT Innovation Pilot Framework Filing

Pursuant to the Commission's June 19, 2020 correspondence in the subject proceeding,[1] attached is Hawaiian Electric's[2] Electrification of Transportation Innovation Pilot Framework.

Sincerely,

/s/ Marisa Chun

for Kevin M. Katsura
Director
Regulatory Non-Rate Proceedings

Enclosure

c: Division of Consumer Advocacy, dnishina@dcca.hawaii.gov

[1] Commission's June 19, 2020 letter; "The Commission requests that the Companies propose a Framework by August 31, 2020, consistent with the guidance set forth below."

[2] Hawaiian Electric Company, Inc., Maui Electric Company, Limited, and Hawai'i Electric Light Company, Inc. are each doing business as "Hawaiian Electric" and have jointly registered "Hawaiian Electric" as a trade name with the State of Hawai'i Department of Commerce and Consumer Affairs, as evidenced by Certificate of Registration No. 4235929, dated December 20, 2019.

Electrification of Transportation Innovation Pilot Framework

1. Introduction

We are embarking on the greatest transformation of the transportation sector since President Dwight D. Eisenhower signed the National Interstate & Defense Highway Act in 1956. This new era of mobility converges with the transformation of the electric grid, unprecedented access to data, and rapidly commercializing new technology, like electric vehicles, batteries, and charging infrastructure, making it possible for both systems to be cleaner, more reliable and more accessible.[1] It is important to note that although the Interstate Highway System connected communities and supported economic reconstruction after WWII, it also resulted in increased air pollution, displaced neighborhoods, congestion and human loss. In this new era, we can collectively create something better than before, a system that supports the environment, economy and community. As evident in Hawaiian Electric Company, Inc.'s, Hawai'i Electric Light Company, Inc.'s and Maui Electric Company, Limited's[2] (hereinafter collectively "Hawaiian Electric" or "Company") Electrification of Transportation ("EoT") Strategic Roadmap,[3] the Company is uniquely positioned to support this change through the electrification of transportation.

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[1] There has been over $200 billion invested in mobility startups and $33 billion invested specifically in electric vehicles, charging and batteries since 2010. There has been an average investment of $5.5 billion per year over the last five years in electric vehicles, charging and batteries. "Start Me Up: Where Mobility Investments are Going" McKinsey & Company. https://www.mckinsey.com/industries/automotive-and-assembly/our-insights/start-me-up-where-mobility-investments-are-going#. Accessed August 17, 2020.

[2] Hawaiian Electric Company, Inc., Maui Electric Company, Limited, and Hawai'i Electric Light Company, Inc. are each doing business as "Hawaiian Electric" and have jointly registered "Hawaiian Electric" as a trade name with the State of Hawai'i Department of Commerce and Consumer Affairs, as evidenced by Certificate of Registration No. 4235929, dated December 20, 2019.

[3] Filed in Docket No. 2016-0168, on March 29, 2018.

In order to transition by design, and not default, there is a need for speed and adaptability. As part of this transformation Hawaiian Electric aims to develop new programs, test technologies, and evaluate pricing mechanisms while also working to mitigate the effects of climate change, respond to market forces, and listen to input from its community and customers. With ground transportation responsible for more than 50 percent of greenhouse gas emissions in Hawai‘i, transportation electrification presents an opportunity for rapid decarbonization to support the State's target for negative carbon emissions by 2045.[4] As the grid becomes more distributed and powered by renewable energy, there is an opportunity to align and incentivize charging to support the needs of the grid. The COVID-19 pandemic of 2020 makes salient the importance of the Company's ability to respond quickly to unexpected societal, economic, and environmental conditions. This Innovation Pilot Framework allows the Company to respond to time-sensitive opportunities and better serve customers and communities through thoughtful design, stakeholder feedback, iteration, and an eye toward scale. These initiatives are outlined in Figure 1 below.

2. Regulatory Background

On March 29, 2018, the Company submitted its Electrification of Transportation Strategic Roadmap that identified ten key initiatives it would pursue in support of the anticipated growth of clean transportation and infrastructure in Hawai‘i.

[4] In Hawai‘i's 2016 GHG Inventory, transportation (excluding aviation) accounted for 4.85 out of 9.23 million metric tons (MMT) of carbon dioxide equivalent. Hawai‘i Clean Air Branch, Greenhouse Gas Emissions Dashboard, Accessed August 14, 2020, https://dashboard.hawaii.gov/stat/goals/5xhf-begg/fgyu-2f7k/y5ya-s7nf.

Figure 1. Electrification of Transportation Strategic Roadmap Initiatives

Initiative	Description
Initiative #1:	Work with partners to deliver education and outreach campaigns to drivers, dealerships, fleet managers, and taxi and ridesharing companies or TNCs
Initiative #2:	Continue to electrify Hawaiian Electric's own fleets as availability of electrified vehicle technologies expands and total cost of ownership comes down
Initiative #3:	Work with partners to find ways to lower Electric Vehicles ("EV") purchase costs
Initiative #4:	Investigate and develop opportunities to lower customer energy bills in exchange for "smart" charging of vehicles and provision of grid services
Initiative #5:	Expand access to EV charging for residents residing in multi-unit dwellings ("MUDs"), i.e., condominiums and apartment buildings
Initiative #6:	Expand availability to workplace charging
Initiative #7:	Expand availability of public charging stations
Initiative #8:	Engage in the tourism industry
Initiative #9:	Encourage and enable electrification of smart charging of buses
Initiative #10:	Encourage and enable electrification of medium and heavy-duty vehicles and off-road equipment as EV technologies mature and become commercially available at reasonable cost

These initiatives establish high-level priorities for EoT but leave the implementation details largely undefined. Having identified the high-level objectives, the Company has started undertaking various programmatic efforts aimed to effectuate these initiatives through pilot programs, with the intent to draw from those experiences to develop larger-scale programs as appropriate.

In accordance with Commission Order No. 36448, issued on July 31, 2019, in Docket No. 2018-0135, the Company submitted its Workplan, consistent with Commission guidance that the "[c]ompanies . . . identify and evaluate opportunities to support electrification of transportation through 'make-ready' infrastructure as a short-term priority." In that submittal, the Company identified three major filings to be submitted in the 2020 timeframe that would support the initiatives identified in the Roadmap, in the near-term. Those filings were identified as an electric bus make-ready program; a rate design; and a make-ready program for fleets, workplaces, multi-unit dwellings, and commercial settings, commonly referred to as the "commercial make-ready" filing. The electric bus ("eBus") make-ready filing was submitted on July 10, 2020.[5]

On June 19, 2020, the Commission issued a letter ("Letter") in Docket No. 2018-0135, related to EoT pilot project initiatives. In the Letter, the Commission directed the Company, among other things, to develop an "innovative pilot projects program framework ("Framework") for use in establishing new technologies, programs, and business models related to the Company's EoT efforts," further stating that,[6] "[i]t is essential that any of the Companies' future EoT pilot projects align with the objectives in other Commission dockets (e.g., Distributed

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[5] See Application for Approval of an Electric Bus Infrastructure Make Ready Pilot, submitted in Docket No. 2020-0098 on July 10, 2020.
[6] See Letter at page 2.

Energy Resources (Docket No. 2014-0192), IGP, PBR) and State policy goals. The Commission intends that a Framework will allow the Companies to pursue pilots within the EoT proceeding in an expedited way and that lessons from the expedited process may inform innovative efforts in other dockets before the Commission (for example, PBR and IGP)."

The Commission requested that the Company develop and submit a proposed Framework by August 31, 2020, consistent with key elements drawn from Green Mountain Power's ("GMP") pilot program framework. To aid in the Company's development of a proposed Framework, the Commission cited elements from GMP's pilot framework model.

GMP's approach uses a framework that establishes a non-tariffed process for pilots and enables third parties and customers to be active partners in the deployment of innovative solutions. To fund this framework, GMP received approval to spend up to $5 million on pilots annually.[7] Under this framework, GMP must provide a 15-day advance notice to the Vermont Department of Public Service and the Public Utilities Commission, with a copy to Efficiency Vermont, before commencing any innovative pilot.[8] In addition, seven days advance notice of changes to innovative pilots' pricing, terms, or conditions must be filed, and a written notice of changes must be sent to participating customers.[9]

Prior to receiving the Commission's Letter on June 19, 2020, the Company filed a proposal for an Innovation Pilot Framework in their Phase 2 Statement of Position on June 18,

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[7] Green Mountain Power, "Schedule G-1 – Summary of New Initiatives and Innovative Pilots," June 2019. https://greenmountainpower.com/wp-content/uploads/2019/06/Schedule-G-New-Initiatives-Innovative-Pilot-Summary.pdf

[8] *Efficiency Vermont* is Vermont's energy efficiency utility. The Vermont Public Service Board ordered the creation of the energy efficiency utility in response to a request from the Department of Public Service, the state's electric utilities, and consumer and environmental groups.

[9] Green Mountain Power, "Green Mountain Power's Petition for Approval of a Multi-Year Regulation Plan," Prefiled Testimony of Edmund F. Ryan, Attachment 2 – Innovative Pilots, June 2018. https://greenmountainpower.com/wp-content/uploads/2018/06/Attachment-2-Innovative-Pilots.pdf

2020. This proposal responded to the Commission's March 2020 guidance as part of the performance-based regulation ("PBR") investigation (Docket No. 2018-0088). The PBR Innovation Pilot Framework addresses a broader scope of initiatives within the Company, "leveraging … prior related strategic plans, including IGP, Grid Modernization Strategy ("GMS"), Renewable Portfolio Standards ("RPS") resource procurements, Customer Energy Resources ("CER") Strategy, and the EoT Strategic Roadmap."[10] In contrast, the instant proposed EoT Framework incorporates the Commission's guidance from its June 19, 2020 letter, and is narrowly focused on efficiently promoting innovative EoT pilot projects.

The following section summarizes the Company's pilot Framework approach in developing the EoT Workplan, implementation process, and pilot evaluation and reporting followed by key element details to the Framework recommended by the Commission.

3. Overview

3.1. Framework Recommendation

At a high-level, the Company recommends a Framework that includes the following:

- Ten-year Framework term length
- Pilot funding not to exceed $5 million per year[11]
- Flexibility to implement multiple pilots per year
- Standardized reporting periods and metrics
- 30-day notice filing window prior to implementation

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[10] Docket No. 2018-0088 HECO Phase 2 SOP p. 223.

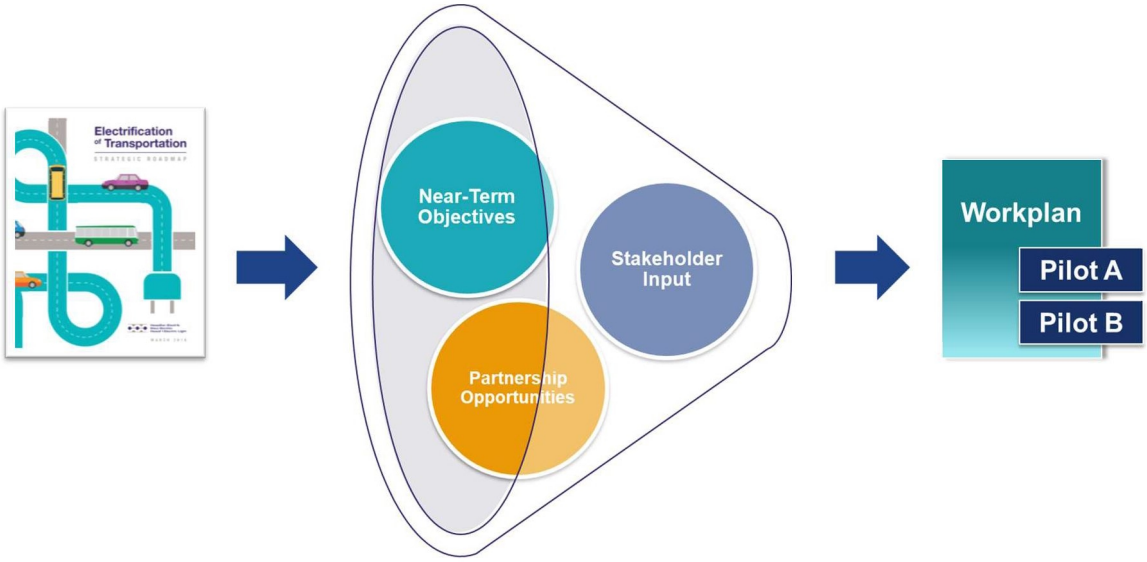
[11] As further discussed below, this funding amount was derived from eBus Make-Ready and Commercial Make-Ready pilot scope as a starting point for the cost assumption. On a case by case basis, the Company may request Commission approval to exceed this annual limit.

- Most likely cost recovery mechanism will be through the Renewable Energy Infrastructure Cost Recovery Provision "REIP"
- Flexibility to utilize other cost recovery mechanisms where applicable
- Stakeholder driven engagement model to develop pilots

3.2. Strategic Alignment

The Pilot Framework draws upon the refinement of high-level priorities established in the EoT Strategic Roadmap to identify suitable infrastructure and customer pilot programs through the development of workplans. These workplans will be developed on a biennial basis to address near-term objectives and needs and will serve as the foundation for pilot initiatives. Figure 2, below illustrates the workplan development process.

Figure 2. Workplan Development Process

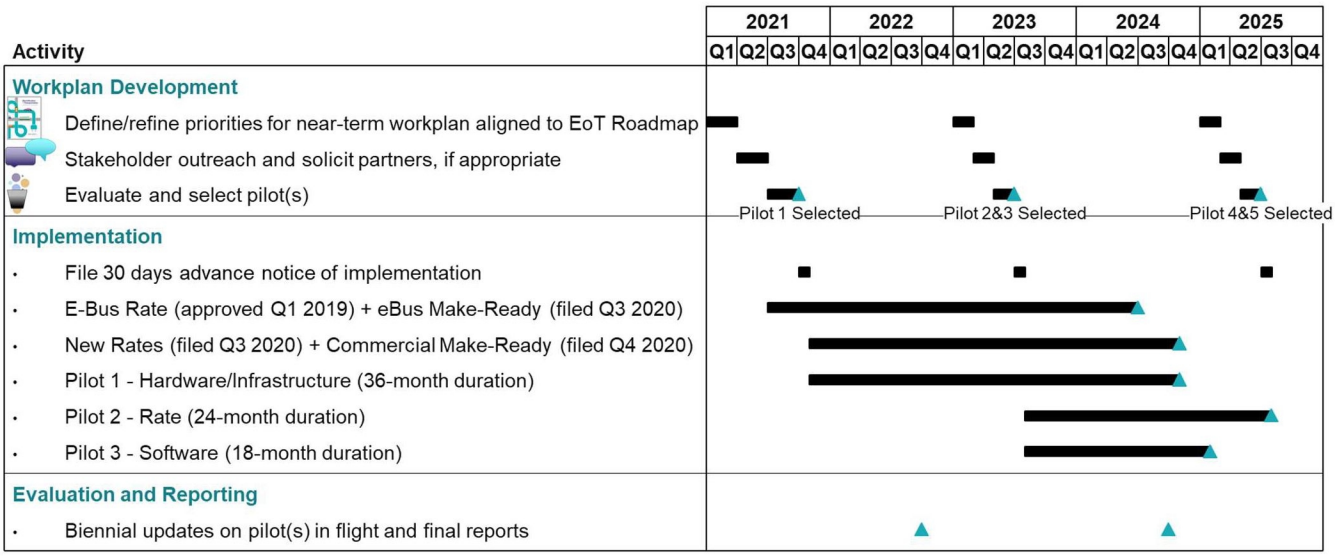


This process will ensure that there is a linkage between the Company's EoT strategy and the pilots that ultimately flow through the Framework.

3.3. Process

The Framework process, as shown in Figure 3 below, indicates how multiple pilots could be managed using an illustrative schedule for workplan development, implementation, and evaluation/reporting.

Figure 3. Illustrative Framework Pilot Process



3.4. Workplan Development

The Workplan development will occur biennially over a six-to-nine-month period, taking between nine and twelve months in the first year and between six and nine months in subsequent years as the Company refines its processes. The Company will evaluate needs and opportunities within its EoT Strategic Roadmap initiatives, assess market availability of technologies, examine long-term customer benefits, explore impacts on key performance metrics and evaluate market needs in the Company's service territory to identify its highest priorities. These priorities, along with stakeholder input, will inform a near-term workplan for the development and implementation of pilot programs. Key stakeholders including the Commission and Consumer

Advocate will be invited to participate. Taking an iterative approach, process efficiencies will be utilized to shorten the pilot selection process. The Company intends to be inclusive and transparent in its stakeholder engagement processes and address the need for and deployment of proposed pilot programs.

3.5. Implementation

Upon submitting the Workplan, the Company will file a 30-day advance notice with the Commission before commencing each pilot project. The notice will include a narrative explanation of the pilot project, key customer benefits (participants and non-participants where applicable), eligibility requirements, subscriber cap (if applicable), lifecycle GHG analysis (if applicable), an estimate of the pilot costs and forecasted revenues (if applicable), project timeline, reporting requirements, and success criteria. Any discontinuance of a pilot or material changes to the pricing, terms, or conditions will be filed 30 days in advance with written notifications sent to participants following Commission review.

3.5.1. Pilot Duration Length

Due to the dynamic nature of technology trends, there may be pilot projects with varying levels of complexity and scope. As such, the Framework allows for flexibility in the pilot duration and project costs. For example, equipment and infrastructure solutions may require more resources and time to support engineering planning, procurement, permitting, construction, and commissioning. Likewise, rate design pilots could be implemented over a shorter duration with a limited scope but could require more time when incorporated with an infrastructure program such as the E-Bus tariff and eBus Make-Ready Pilot. In contrast, turn-key, out-of-the-box software as a service ("SaaS") solutions that do not require significant integration effort, or an in-depth evaluation of information security risks can be implemented relatively quickly.

Some pilots may not incur capital costs but will flow through the Framework process illustrated in Figure 3, above, to ensure consistency and transparency of the overall process.

3.5.2. Pilot Revenues

Revenues from the pilot that are related to electric sales will be part of the revenue decoupling mechanism. Revenues from the pilot program that do not fall under electric sales revenue, will be included as Other Operating Revenues. Other Operating Revenues would be excluded from the comparison to target revenues under the decoupling mechanism. Other Operating Revenues would be part of the calculation in comparing the achieved return on average common equity to the authorized levels to determine the earnings sharing revenue credit (referred to as the "Earning Sharing Mechanism" or "ESM") under the decoupling mechanism.

Expenses related to the pilot program would be included in determining earnings for the ESM. Capital investments related to the pilot program would be charged to construction work in progress and transferred to plant in service when placed in service. Consistent with other utility assets placed in service, pilot program assets would be included in a rate base and depreciated consistent with Company's normal depreciation practice. Software costs under the pilot program would be deferred, consistent with the Company's Accounting guidance for software development costs. The deferred costs would be amortized following the month the software is placed in service, over twelve years (unless a different period is authorized by the Commission), and the unamortized costs would be included in rate base. If applicable, the Company proposes to include in the notice filing any request to defer costs and approval to defer any software costs.

3.6. Evaluation and Reporting

The Company will file updates on the status of the pilots on a regular basis. Implementing a single report will provide a snapshot of all pilots in flight and increase efficiency

through a consistent format. It will also provide opportunities to evaluate lessons learned and identify areas for improvement. This may also include final reporting on completed pilots. As shown in Figure 3, no annual report will be issued in 2021 as new pilot(s) are being established.

4. Innovation Pilot Framework Elements

The following outlines the Framework elements to be included in the advanced notification of EoT pilots.[12]

4.1. Project Summary

The project summary identifies expected outcomes of the pilot project (e.g., added or improved services), including methods for measuring success and risk. It includes the following components:

4.1.1. How the outcomes of the pilot project are aligned with State energy goals and Commission orders, including, but not limited to:

- Docket No. 2019-0323; Distributed Energy Resources ("DER")
- Docket No. 2018-0088, Performance Based Regulation ("PBR")
- Docket No. 2018-0165, Integrated Grid Planning ("IGP")
- The State's energy efficiency efforts

4.1.2. Areas of potential overlap with other existing project(s)/program(s)

4.1.3. If there is overlap, how it will be addressed by the pilot project

4.1.4. Metrics for tracking the success of the pilot project that will be periodically used to evaluate progress throughout the course of the pilot

[12] The Commission's Letter identified elements I-VII from the GMP framework and also encouraged the Company to take a creative approach in designing its framework. The GMP framework's elements inform the elements set forth in this proposal.

4.2. Eligibility Requirements

Pilot projects should:

4.2.1. Involve products or services beyond the sale of basic electric service, including innovative rate designs that support the priorities in the EoT Strategic Roadmap.

4.2.2. Support transformative customer-facing electric transportation projects and utility facing pilots that support or improve the customer experience in the EoT space.

4.2.3. Require an initial upfront investment by the Company; partners may fund other parts of project execution to improve net benefits to non-participants. The Company will evaluate ways to mitigate costs by co-developing or engaging in strategic partnerships, where applicable.

4.2.4. Target a neutral or net positive benefit to non-participating customers through considerations such as new sources of revenue, cost savings over a defined time period, or other metrics such as a reduction in greenhouse gasses and contributions to state policy goals via the reduction in imported fossil fuels.[13]

4.2.5. Provide the Commission, Consumer Advocate, and key stakeholders reasonable access to data. Such data may include aggregated, anonymized customer data required to assess key performance metrics such as the number of customers in a given geographic location, average installation costs, kWh consumed.

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[13] It is paramount to select pilot programs that benefit all customers, including those not participating. In addition to customer benefits, it can also provide new sources of revenue for the Company to potentially offset pilot program costs, provide customer cost savings over a defined time period, contribute to reduction in greenhouse gasses, and state policy goals via the reduction in imported fossil fuels. Due to higher startup costs and the inability to amortize capital over the actual life of the product it is difficult for pilots to achieve positive net revenue benefits over its short program duration. However, when benefit analyses include longer program cycles, and/or externalities (e.g. avoided grid upgrade costs in future years, GHG emissions reductions, improved economics at higher customer participation, etc.) then pilot projects can and should show a neutral or positive net customer benefits. The Company will include GHG emission reductions as a key performance metric where appropriate.

4.2.6. Incorporate participant customer surveys or measurement and verification evaluation to measure progress against program success criteria and metrics.

4.3. Cost Analysis: Framework Budget and Recovery Mechanism

The Company agrees with the Commission's suggestion that a stable funding source is necessary to support the development of innovative pilot projects. Given the department-specific nature of the EoT Innovation Framework directive, the Company drew upon existing proposed pilots in the EoT Workplan to determine the scope and approach to the anticipated pilot costs.

The Company proposes an annual pilot budget not to exceed $5 million per year, for an initial period of 10 years.[14] In establishing this projected amount, the Company evaluated the estimated pilot costs of the eBus Make-Ready Infrastructure Pilot filing of $4.3 million and assumed a similar pilot budget for the upcoming Commercial Make-Ready Pilot application.[15] Assuming there are multiple pilots in flight during a given time period, project costs will be spread over multiple years with other pilots running concurrently at different stages of implementation.

As mentioned in the Pilot Framework summary, the revenue recovery mechanism will depend on the characteristics of the pilot. While REIP will be the likely recovery mechanism, other mechanisms such as the Major Projects Interim Recovery (MPIR) adjustment mechanism and the Revenue Adjustment Mechanism (RAM) cap will be considered where applicable.[16]

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[14] The Company is open to discussing escalation of the funding cap over time, as appropriate.
[15] See eBus Make-Ready Infrastructure Pilot, at 17-18.
[16] The Company believes that the REIP will apply to most projects when considering the likely scope and size of the pilots. While it is possible that some pilots may exceed the $2.5 million per-company threshold for General Order No. 7 application, it is more likely that individual pilots will remain below $2.5 million per company.

4.4. Key Performance Metrics

To ensure a comprehensive approach, the Framework includes key performance metrics (KPM) that are consistent across all projects, called Global KPMs. Each pilot project will also have a set of clearly defined objectives and KPMs unique to their design. Global KPMs will include:

4.4.1. Customer Satisfaction

The Company will issue surveys to pilot participants that will include, but are not limited to, the following:

- Overall customer satisfaction and experience
- Customer enrollment (i.e. ease of program enrollment)
- Meeting desired outcomes of the pilot
- Customer recommendation of program

4.4.2. Demand and Energy Impact (if applicable)

- Analysis of avoided on-peak demand[17]
- Analysis of kWh consumption

4.4.3. Progress Toward the State's 100% Clean Energy Goal

The Company contends that the establishment of a standardized approach to ongoing greenhouse gas reporting would enable greater evaluation and establishment of customer benefits beyond economic measures, but also eliminate confusion or differing metrics from stakeholders.

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[17] GMP, along with most other utilities on the continent, have the benefit of using secondary market data to estimate and monetize the costs for anticipated load shifting at any given time. In order to do the same type of analysis, the Company would need to generate a full production simulation prior to each potential pilot, which could add significant cost to the pilot program. Therefore, the Company recommends utilizing data collected from each pilot to establish reference scenarios and calculate benefits during pilots. Any programmatic filing to expand upon a pilot, or a future pilot with similar characteristics, would draw from this analysis. The modeling results post-pilot would be more accurate given the real-world data inputs received.

This approach would enable a more efficient methodology and open doors to a more nuanced discussion of customer benefits as a whole.

4.5. Schedule

Each pilot project will include an implementation schedule that includes the project's anticipated duration and key milestones. Key milestones will include the project launch as well as the timing of the final report.

4.6. Reporting Requirements

To improve transparency and stakeholder engagement, the Company will file a report on the status of all pilot projects in flight on a biennial basis ("Pilot Update"). The Pilot Update will include updates on the following:

4.6.1. Implementation schedules and progress relative to the pilot's objectives and KPMs

4.6.2. Impact on underserved communities

4.6.3. Pilot costs and revenues (if applicable)

- Cost analysis per subscriber and benefits including benefits to non-subscribing customers
- Financial information regarding costs and revenues of the pilot
- Description of the pilot and customer benefit (participant and non-participant)

4.6.4. Communicate material changes to the pilot program such as:[18]

- Pilot program pricing
- Terms or conditions

[18] Changes to the pilot will be summarized and submitted in a 30-day advance notification to the Commission as appropriate.

- Eligibility requirements
- Changes to the implementation schedule
- Pilot program cancellations and reasons behind the cancellations

4.6.5. Final Report

The Company anticipates including final pilot reports in the Pilot Update, which will be established in the pilot project's schedule upon Commission approval. The final report may include the utility's marketing efforts and expenses incurred, methods for analyzing impacts, cost-effectiveness, and customer retention. In addition, it will include challenges and lessons learned, process improvements, a determination of the success of the pilot, and any future permanent implementation plans based on an evaluation against the metrics established.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document, together with this Certificate of Service, were duly served on the following parties and participants, by having said copies delivered by electronic service, by hand delivery, and/or by mailing a copy by United States mail, postage prepaid, as set forth below:

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DATED: Honolulu, Hawai'i, October 29, 2020.

/s/ Andrew Nojiri
Andrew Nojiri
HAWAIIAN ELECTRIC COMPANY, INC.
Regulatory Affairs

The foregoing document was electronically filed with the State of Hawaii Public Utilities Commission's Document Management System (DMS).